

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

VALERIE GREY and
BRIDGET SMITH,

Plaintiffs,

v.

SOURCECORP, INC.,

Defendant.

CIVIL ACTION NUMBER:
2:05-cv-01039-WKW

REPORT OF PARTIES' PLANNING MEETING

The parties file with the Court the following Report of Parties' Planning Meeting pursuant to Federal Rules of Civil Procedure 26(f):

1. Pursuant to Fed. R. Civ. P. 26(f), a meeting was held on **January 18, 2006** and the following counsel participated:

Jon Goldfarb on behalf of Plaintiffs Valerie Grey and Bridget Smith, and

Donna Eich Brooks on behalf of Defendant Image Entry of Alabama, Inc.
(d/b/a SOURCECORP Business Process Solutions).

2. Pre-Discovery Disclosures. The parties will exchange by **February 8, 2006**, the information required by Local Rule 26.1(a)(1).

3. Discovery Plan. The parties jointly propose to the court the following plan:

a. Discovery will be needed on the following subjects: **Plaintiffs' claims and allegations and Defendant's defenses to same.**

b. All discovery commenced in time to be completed by **December 11, 2006**.

c. Maximum of **30** interrogatories by each party to any other party.
Responses due 30 days after service.

d. Maximum of **40** requests for production by each party to any other party. Responses due 30 days after service.

e. Maximum of **30** requests for admission by each party to any other party. Responses due 30 days after service.

f. Maximum of **10** depositions by Plaintiffs and **10** by Defendant.

g. Reports from retained experts under Rule 26(a)(2) due:

from Plaintiffs by **August 7, 2006**;

from Defendant by **September 7, 2006**.

h. Supplementations under Rule 26(e) due as soon as practicable but in any event by **November 1, 2006**.

4. Other Items.

a. The parties do not request a conference with the court before entry of the scheduling order.

b. Plaintiffs should be allowed until **May 15, 2006** to join additional parties and amend the pleadings.

c. Defendant should be allowed until **June 15, 2006** to join additional parties and amend the pleadings.

d. All potentially dispositive motions should be filed by **October 27, 2006**.

e. Settlement cannot be realistically evaluated prior to close of discovery.

f. The parties request a final pretrial conference in **January 2007**.

g. Final lists of trial evidence and objections thereto under Rule 26(a)(3) will be due as follows:

- from Plaintiffs: witness and exhibit lists by 21 days prior to trial;
- from Defendant: witness and exhibit lists by 21 days prior to trial.

h. The case should be ready for trial by **February 2007**, and at this time is expected to take approximately **3** days.

DATED this 20th day of January, 2006.

Respectfully Submitted,

s/Donna Eich Brooks
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Donna Eich Brooks ASB-9566-O60D

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